UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

MILSTEAD & ASSOCIATES, LLC

By: Andrew M. Lubin Atty. ID: AL0814

1 E. Stow Road Marlton, NJ 08053

(856) 482-1400

File No. 88.35142BKY

Attorneys for Movant: CitiMortgage, Inc.

In Re:

Carole Snuka aka Carole Maston

Case No.: 15-19691-ABA

Chapter 7

Hearing Date: September 22, 2015

Time: 10:00 a.m.

Judge: Andrew B. Altenburg, Jr.

NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY

PLEASE TAKE NOTICE that on September 22, 2015 at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorney for the secured creditor, CitiMortgage, Inc., will move before the United States Bankruptcy Court for the District of New Jersey, for an Order vacating the automatic stay with respect to movant and property known as 647 Pacific Avenue, Atco, NJ 08004.

PLEASE TAKE FURTHER NOTICE that if you wish to contest this motion you must file a written response with the Clerk of the Bankruptcy Court and serve a copy of the responding papers upon the undersigned at least seven (7) days before the hearing date.

PLEASE TAKE FURTHER NOTICE that you may be responsible for attorney's fees and costs associated with this motion.

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PLEASE TAKE FURTHER NOTICE that the moving party avers that no brief is necessary as the matter does not involve complex legal issues.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby waives oral argument and relies upon the certifications in support of this motion unless the matter is contested.

Dated: August 27, 2015 MILSTEAD & ASSOCIATES, LLC

BY: <u>/s/Andrew M. Lubin</u> Andrew M. Lubin, Esquire